

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

FIREXO INC.,

Plaintiff,

v.

FIREXO GROUP LIMITED,

Defendant.

Case No. 3:21-CV-02336

Judge Jack Zouhary

**PLAINTIFF'S MOTION FOR LEAVE TO AMEND ITS
COMPLAINT TO JOIN FIREXO CORPORATION
AS A DEFENDANT UNDER FED. R. CIV. P. 15(a) AND 20(a)**

To further judicial economy, avoid injury to the Firexo Inc., and facilitate the complete resolution of this matter, Firexo Inc. respectfully moves under Fed. R. Civ. P. 15(a) and 20(a) for leave to amend its complaint to join Firexo Corporation (a Delaware corporation) in this action as additional defendant. Firexo Inc.'s Proposed Second Amended Complaint is attached as Exhibit A to this motion.

STATEMENT OF FACTS

1. The Case Management Order (Doc. 29) was entered on June 7, 2024.
2. On September 19, 2024, all counsel for Firexo Group Limited (FGL) made a motion for leave to withdraw as counsel (Doc. 31) based on "fundamental difference between Calfee and FGL that require Calfee to move for leave ... consistent with Ohio Rule of Professional Conduct 1.16." (Doc. 31 at ¶1). The court granted Calfee's motion on September 20, 2024 via minute order (Doc. 32).
3. Recognizing the difficulty in maintaining the case management deadlines with an unrepresented corporate defendant, Firexo Inc. filed on October 3, 2024 a

motion to vacate that order and set a status conference (Doc. 32). That motion is pending.

4. On October 16, 2024, David Breith, as CEO of Firexo Corporation, sent an email to all Firexo Corporation shareholders Mr. Breith's email is attached to this motion as Exhibit B. Firexo Corporation owns 100% of FGL's shares. Firexo Corporation's directors are Messrs. David Breith and Winand Staring, who are also the only directors of FGL. *See* FGL's Confirmation Statement attached as Exhibit C.
5. In his email, Mr. Breith wrote that "FGL's *only function* has been to defend legal proceedings by Firexo's former joint venture partners in the USA and Sweden[.]" Ex. B at ¶2 (emphasis added). Instead of expending the financial resources necessary to defend these cases, "the board of Firexo Corporation (the ultimate Firexo holding entity which we [Firexo shareholders] all share) ... has decided that the best interests of Firexo Corporation's shareholders (and the best interests of FGL creditors) are served by placing FGL into creditors voluntary liquidation.¹ Ex. B ¶5.
6. This is extraordinary for two reasons:
 - 6.1 First, Mr. Breith indicated that FGL was "dormant" and only existing to defend legal proceedings—a fact FGL has never communicated to Firexo Inc. To the contrary, FGL previously admitted "that it manufactures fire extinguishers and fire extinguishing products and that these products are sometimes sold in the United States." Def.'s Answer to Pl.'s First Am. Compl. at ¶ 7 (Doc. 11) (filed on March 31, 2022). Based on FGL's

¹ Creditors' voluntary liquidation in the United Kingdom is a formal insolvency proceeding that a company elects to participate in. In voluntary liquidation, there is no automatic stay on legal proceedings. However, the court can stay actions upon application by the liquidator, a creditor, or a contributory under section 112 of the Insolvency Act. The court's concern is to ensure no creditor obtains an advantage over the general body of creditors and the process of the liquidation is not interfered with. This is because the essential feature of a winding-up is that the company's assets are realized and distributed according to a statutory framework.

admission and statements, Firexo Inc. had no reason to believe otherwise—until Mr. Breith’s October 2024 email.

- 6.2 Second, Firexo Corporation’s board of directors—not FGL’s directors—decided to put FGL into creditors liquidation, FGL had no independent corporate personality, but functions merely as Firexo Corporation’s alter ego. Moreover, both entities (FGL and Firexo Corporation) have the same directors (Messrs. Breith and Staring) and officers.
7. Armed with Mr. Breith’s admission in his email—that FGL is essentially “dormant”—Firexo Inc. investigated FGL via the companies records repository in the United Kingdom.
8. In the United Kingdom, Companies House is responsible for maintaining the records of corporate entities organized under the laws of England and Wales. Companies House maintains a public website (<https://find-and-update.company-information.service.gov.uk/>) on which those records are available.
9. Firexo Inc.’s review of those records revealed that on October 10, 2024, **six days before Mr. Breith’s email**:
 - 9.1 8,600 shares of a Firexo subsidiary (Firexo Motorsport Limited) were transferred out of Firexo Group Limited and into Firexo Holdings Limited—both of which are wholly owned by Firexo Corporation (the Delaware “holding” corporation referenced in Mr. Breith’s email). We have attached Firexo Motorsport Limited’s Confirmation Statement attesting to this transfer as Exhibit D; and
 - 9.2 9,500 shares of another Firexo subsidiary (Firexo Limited) were transferred out of Firexo Group Limited and into Firexo Holdings Limited. Firexo Limited is believed to be the operating sales and fulfilment arm for Firexo’s business in the United Kingdom. We have attached Firexo Limited’s Confirmation Statement attesting to this transfer as Exhibit E.

10. Mr. Breith's email and the contemporaneous transfer of FGL's corporate assets raise serious concerns about the relationship between Firexo Corporation and its subsidiaries (whether they are separate only in corporate form) and the actions of the directors and officers of both FGL and Firexo Corporation in relation to this case.
11. Based on the foregoing and applicable law, Firexo Inc. alleges that the corporate form should be disregarded, allowing Firexo Inc. to reach Firexo Corporation. As alleged in the proposed Second Amended Complaint, Firexo Corporation is liable for FGL's action in this case because (1) Firexo Corporation's control over FGL is so complete that the corporation has no separate mind, will, or existence of its own, (2) Firexo Corporation's control over FGL was exercised in such a manner as to commit fraud or an illegal act against Firexo Inc., and (3) injury or unjust loss resulted to Firexo Inc. from such control and wrong. *Taylor Steel, Inc. v. Keeton*, 417 F.3d 598, 605 (6th Cir. 2005) (citing *Belvedere Condominium Unit Owners' Assn. v. R.E. Roark Cos., Inc.*, 67 Ohio St.3d 274, 617 N.E.2d 1075, 1086 (Ohio 1993)).

STANDARD

12. To decide this motion, the court must consider both the general principles governing amendment under Fed. R. Civ. P. 15(a) and the more specific permissive joinder mechanics of Fed. R. Civ. P. 20(a). *See, e.g., Midwest Terminals of Toledo Int'l v. Int'l Longshoremen's Ass'n*, 3:18-CV-2560, 2021 WL 22463, at *2 (N.D. Ohio January 4, 2021).
13. Fed. R. Civ. P. 15 provides that "a party amend its pleading only with the opposing party's written consent or the court's leave." Fed. R. Civ. P. 15(a)(2). Because cases "should, as far as possible, be determined on their merits and not on technicalities," *Cooper v. Am. Emp. Ins. Co.*, 296 F.2d 303, 306 (6th Cir. 1961), leave to amend "shall be freely given when justice so requires." Fed. R. Civ. P. 15(a)(2). While the ultimate decision of whether to permit an amendment rests within the court's discretion, *see, e.g., Brainard v. Am. Skandia Life Assur. Corp.*, 432 F.3d 655, 666 (6th Cir. 2005), a party opposing

a motion to amend must offer “at least some significant showing of prejudice” to justify denying leave. *Moore v. City of Paducah*, 790 F.2d 557, 563 (6th Cir. 1986) (per curiam). *See also Wallace Hardware Co. v. Abrams*, 223 F.3d 382, 409 (6th Cir. 2000) (noting that in the Sixth Circuit delay alone is an insufficient basis for denying an otherwise appropriate motion for leave to amend).

14. Fed. R. Civ. P. 20(a) permits the joinder in a single action of all persons asserting, or defending against, a joint, several or alternative right to relief that (1) arises out of the same transaction or occurrence; and, (2) presents a common question of law or fact. As Judge Carr noted in *Dottore v. National Staffing Services, LLC*, 3:06-CV-01942, 2007 WL 2114668, at *5 (N.D. Ohio July 20, 2007), Rule 20 “does not require that each joined party have *itself* participated in the transaction or occurrence triggering … the claim for relief.” Rather, the right of relief must have arisen out of the same transaction or occurrence. *Id.* Judge Carr elaborates by noting that an “entity’s liability can ‘arise’ not only from its direct participation in activities … but also from the entity’s legal relationship to the alleged wrongdoer.” *Id.* *See also* 7 Fed. Prac. & Proc. Civ. § 1657 (3d ed.).

ANALYSIS

Firexo Inc.’s Amendment is Appropriate under Fed. R. Civ. P. 15(a)

15. FGL would suffer no substantial prejudice if the court granted Firexo Inc.’s motion. Typically, a court should consider three factors in determining whether substantial prejudice exists: (1) whether the opposing party would expend significant resources to conduct discovery and prepare for trial; (2) whether the amendment would significantly delay the resolution of the dispute; and, (3) whether the amendment would prevent Firexo Inc. from bringing a timely action in another jurisdiction. *Rogers v. I.R.S.*, 822 F.3d 854, 857 (6th Cir. 2016) (citing *Phelps v. McClellan*, 30 F.3d 658, 663 (6th Cir. 1994)).
16. Firexo Inc.’s proposed Second Amended Complaint would not require FGL to expend significant additional resources to conduct discovery and prepare for

trial. The court only set the case management order in June 2024, with the bulk of discovery still ahead (assuming FGL retains counsel and defends) with deadlines in January to March 2025. Dispositive motion deadlines will not be set until the December 4, 2024 status conference, assuming that conference date remains. And, the case has no confirmed trial date. *See Case Management Conference Order (Doc. 29).*

17. Firexo Inc.'s proposed Second Amended Complaint would not materially delay the resolution of the dispute. The allegations contained in the complaint do not alter the underlying bases of liability or claims. Rather, the new allegations would only require exploration of the factual basis to justify disregarding FGL's separate corporate form under Ohio law. Given that the shareholders, directors and officers of FGL and Firexo Corporation are identical and that the business records of FGL and Firexo Corporation are likely held in the same location by the same custodians, the new allegations would not delay the case. What's more, any delay at this point is attributable to FGL, which has yet to retain substitute counsel or provide the discovery documentation it indicated that it would in its skeletal response sent by FGL's prior counsel on September 17, 2024.

Joining Firexo Corporation as a Defendant is Appropriate under Fed. R. Civ. P. 20(a)

18. Fed. R. Civ. P. 20(a) permits the joinder of additional defendants if the right of relief against which the combined defendants must defend (1) arises out of the same transaction or occurrence, and (2) presents a common question of law or fact. Those criteria are met here.
19. Firexo's Second Amended Complaint alleges that Firexo Corporation's liability arises out of FGL's breach of the oral distribution agreement with Firexo Inc. and concomitant tortious conduct against Firexo Inc. And, in that same transaction and series of events, Firexo Inc. alleges that Firexo Corporation overwhelmed FGL's corporate personality such that the separate forms between the two should be disregarded under Ohio law. Proposed Second Am. Compl., Ex. A at ¶¶ 66–87. Firexo Corporation's liability "arises" out of its legal

relationship (sole shareholder of FGL) to FGL, the alleged wrongdoer. *Dottore*, 2007 WL 2114668 at *4-*5 (ruling that parent corporation that allegedly looted its subsidiary, leaving it an empty shell, could be joined as a defendant under Rule 20).

20. Joining Firexo Corporation as a defendant would present a common question of law or fact. Whether FGL breached the oral distribution agreement with Firexo Inc or committed fraud in the inducement are questions of law that must be resolved to determine the liability of both FGL and Firexo Corporation. Other instances of common questions of law and fact also present, including the character of corporate governance at both FGL and Firexo Corporation and the status between the two entities.
21. Joinder of Corp is necessary to allow this Court to issue complete relief, to secure plaintiff's rights against the real party in interest, and to prevent FGL and its remaining officers and directors from perpetrating a fraud and/or evading the legitimate claims asserted by plaintiff in this litigation.

[INTENTIONALLY BLANK]

CONCLUSION

WHEREFORE, Plaintiff, Firexo, Inc. respectfully requests this court enter an Order granting its Motion for Leave to Amend Its Complaint to Join Firexo Corporation as a Defendant.

Respectfully submitted,

/S/ Paul Belazis

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CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2024 a copy of this motion was served on counsel of record for all parties through the Court's CM/ECF system and on David Breith, CEO and director of Firexo Corporation and director of unrepresented defendant Firexo Group Limited via email at *dave.breith@firexo.com*.

/S/ Paul Belazis

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Counsel for Firexo, Inc.

EXHIBIT A

PROPOSED SECOND AMENDED COMPLAINT

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO,
WESTERN DIVISION

Firexo, Inc. * Case No.: 3:21-CV-02336

Plaintiff, * Judge Jack Zouhary

vs. * **SECOND AMENDED COMPLAINT FOR**
Firexo Group Limited, * **DAMAGES WITH JURY DEMAND**
* **ENDORSED THEREON**

And *
Firexo Corporation, * Paul T. Belazis (0030356)
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Counsel for Plaintiff

I. PARTIES

1. Plaintiff, Firexo, Inc. (hereinafter “Plaintiff” or “Firexo”), is a Florida corporation licensed to do business in the State of Ohio.
2. Firexo’s principal place of business is Port Clinton, Ottawa County, Ohio.
3. Plaintiff is in the business of selling fire extinguishers and fire extinguishing

products through a sole distributorship agreement with defendant Firexo Group Limited (hereinafter “FGL”).

4. Through its agreement with FGL, Firexo has the sole right to sell and/or distribute for sale in the United States fire extinguishers and fire extinguishing products manufactured by FGL.

5. Defendant FGL is a British company doing business in Ottawa County, Ohio.

6. Upon information and belief, FGL’s principal place of business is Reading, Berkshire, in the United Kingdom.

7. FGL manufactures fire extinguishers and fire extinguishing products that are subsequently sold in the United States through FGL’s exclusive distributorship agreement with Firexo.

II. STATEMENT OF FACTS

A. Allegations as to FGL

8. In August 2019, Firexo entered into a contractual agreement with FGL, giving Firexo the sole right to distribution and sale of FGL fire extinguishers and fire extinguishing products in the United States.

9. In an effort to induce Firexo to enter into a sole distributorship agreement, FGL represented that its product line was “biodegradable,” “nontoxic,” and “environmentally friendly” and that it did not contain toxic and/or environmentally harmful chemicals found in all competing fire extinguishing products sold in the United States.

10. In addition, FGL represented that it was in the process of securing UL certification for its products, that it possessed the expertise and capacity to successfully and

expeditiously secure such certification within six months, and that it had already secured a European certification known as EN3.

11. In the United States, large corporate facilities, industrial facilities, and government entities, including school systems, police and fire agencies, and federal, state and local government facilities (the “Prospective Customers”), represent the largest market for sale of fire extinguishing products, accounting for more than 80 percent of potential sales.

12. All such Prospective Customers require UL certification of fire extinguishing products.

13. The purchase of such products for home use constitutes a significantly smaller market for sales which typically occur through distributors or retail sellers.

14. The home market end users typically do not require UL certification but certification is sometimes required by distributors and retailers who sell fire extinguishing products for home use.

15. Because fire extinguishing products sold in the United States are universally toxic to humans and the environment, FGL’s representation that its products were “biodegradable,” “environmentally friendly,” “non-toxic,” and “made from natural ingredients, including “water, ammonium sulfate and nitrogen” served to place FGL fire extinguishing products far ahead of any competitor in the United States market.

16. Based on its distributorship agreement with FGL, and in reliance on FGL’s representations, Firexo established relationships with distributors and retail companies throughout the United States for distribution and sale of FGL fire extinguishers.

17. Firexo also invested significant sums of money to develop this distribution business and network.

18. In late 2019, pursuant to its sole distributorship agreement, Firexo ordered its first shipment of fire extinguishing products from FGL, including its .5 gallon (hereafter “G”), 1.5G and 2.5G fire extinguishers.

19. in early 2020, Firexo received its first shipment of fire extinguishers from FGL for distribution and sale in the United States. Firexo thereafter began distribution and sale of FGL products for home use to distributors and retail companies with whom it had established relationships.

20. Firexo also made representations to its distributors, based on FGL’s representations and assurances, that UL certification of its fire extinguishing products was imminent and that EN3 certification had already been secured.

21. FGL products not yet distributed or sold by Firexo were stored in its Port Clinton, Ohio warehouse.

22. Starting in August 2020, Firexo detected corrosion on the threaded portion of the top spray assembly which connected to the opening of the fire extinguishing vessel on some of the FGL fire extinguisher in its Port Clinton warehouse, including the .5G, 1.5G and 2.5G extinguishers.

23. Detailed information related to this corrosion was immediately provided to FGL, including photographs.

24. Firexo thereafter engaged in ongoing verbal and electronic communications with FGL representatives in an effort to resolve concerns related to this corrosion, which represented a serious potential defect in FGL’s product line, including repeated requests that FGL secure an independent third-party analysis to determine the cause of the corrosion.

25. Despite repeated efforts to address and resolve concerns related to flaws in the design and/or manufacture of FGL's fire extinguishers, FGL neglected and/or refused to take any meaningful action to determine the cause of the corrosion, to acknowledge that a problem existed. Furthermore, FGL was aware of, but failed to disclose, the existence of these product defects even before any product was shipped to Firexo for resale in the United States.

26. Rather, even after the foregoing product defects were brought to its attention, FGL attempted to minimize the problem and insisted that Firexo should continue selling its products throughout the United States.

27. On or about November 2, 2020, based on FGL's failure to take corrective action, Firexo suspended the sale of all FGL product lines that had shown evidence of corrosion.

28. Over 6000 fire extinguishing vessels were affected by this suspension in sales activity.

29. Although Firexo immediately notified FGL of the suspension of sales activity, FGL again declined to take any action to determine the cause of the corrosion, insisting instead that Firexo should return the product to the stream of commerce, uncorrected.

30. Efforts to resolve this dispute continued through November and December 2020 but repeated requests for an independent scientific analysis to determine the cause of the corrosion continued to be rejected by FGL and was never provided.

31. On or about January 19, 2021, Firexo received notification that a fire extinguisher sold to an end user had failed, with the customer reporting that the customer heard a "popping" sound during the night and discovered the top assembly handle of the fire extinguisher disconnected from the vessel and embedded in a ceiling tile.

32. The vessel, like those earlier detected by Firexo in its warehouse, showed evidence of corrosion around the threaded portion of the spray assembly where it connects to the opening of the fire extinguishing vessel.

33. FGL was immediately notified of this field failure.

34. On January 20, 2021, immediately after learning of the above referenced field failure, Firexo began notifying all distributors, retailers and other known customers who had purchased the FGL extinguishers that the use of these products should be discontinued and the products should be returned.

35. All customers who could be identified were directed to return the product, provided with pre-paid methods of return, and given a full refund.

36. These actions were immediately reported to FGL.

37. Between January 22, 2021 and February 12, 2021, Firexo received four additional reports of field failures in which corrosion of the threads at the top of the extinguisher vessel had appeared to be the cause.

38. These additional field failures again were immediately reported to FGL but FGL again refused to acknowledge the existence of any problem and refused to take steps to determine the cause of the defect in its extinguishers or otherwise assist in the resolution of this serious and dangerous problem.

39. In addition, FGL declined to assist in any recall effort of the extinguishers that had been sold, or to accept return of the unsold product that remained in Firexo's warehouse.

40. Based on FGL's refusal to conduct an independent investigation of the cause of the product failures, Firexo retained an independent metallurgical engineering firm to conduct a failure analysis of the corroded vessels.

41. The report of the engineers, dated February 12, 2021, confirmed a defect in the design of the vessels and valves (the designated composition of the vessels/valves, given the composition of the contents), which resulted in the corrosion and failure of the vessels/valves in the field. In addition, test results contained in the report of the engineers revealed that FGL's fire extinguishing foam, contrary to FGL's repeated representations, contained fluorosurfactants, a highly toxic form of "forever chemical" that is not only known to be a cancer-causing agent but also far from "biodegradable."

42. Firexo also filed a report with the Consumer Product Safety Council (CPSC) pursuant to statutory duty advising of the product failure, subsequent recall, and surrounding circumstances. This report was supplied to FGL.

43. Only after Firexo submitted a report of product defect to the CPSC did FGL agree to accept return of the extinguishers subject to the design flaw. FGL also agreed to address the product failure and to repair and return the flawed extinguishers.

44. None of the extinguishers, however, were repaired or returned to Firexo. Furthermore, FGL has refused to provide any evidence that the cause of the problem has been corrected.

45. Firexo incurred substantial expense to purchase extinguishers from FGL for distribution and sale in the United States.

46. FGL subsequently incurred additional expense to recall and reimburse customers for return of extinguishers found to be defectively designed and unsafe, to carry out its statutory duty to report the defect, and otherwise to comply with obligations related to protection of consumer safety.

47. FGL has failed to reimburse Firexo for any expense.

48. Although FGL has represented that the design defect has been corrected, it has refused, despite repeated requests, to provide any documentation to support its representations or to permit FGL to contact any of its engineers to discuss these serious design and safety concerns.

49. Further, FGL has failed to supply Firexo with any additional supply of extinguishers for sale in the United States.

50. After making representations to Firexo and to the general public that its fire extinguishing products were “nontoxic,” “biodegradable,” “made from organic materials” and “environmentally friendly,” FGL subsequently retreated from those initial representations and advised Firexo that the terms initially represented as accurately describing its products can no longer be used in their marketing or sale. In addition, FGL began to offer justifications for use of some of these terms that did not comport with their generally understood meaning and were calculated to deceive (how about mislead?) prospective purchasers.

51. In early January 2021, after Firexo demanded that FGL address and correct the defects in its fire extinguishers, FGL licensed another corporate entity in the United States to sell its fire extinguishing products, in violation of the exclusive distribution rights originally granted to Firexo. The competing company, Firexo Holdings Corp., is a Florida corporation.

52. In December 2021, advised Firexo that its “license” for use of FGL’s “intellectual property,” “U.S. trademarks,” and “patented formula” was terminated.

53. At all times relevant hereto, FGL knew or should have known that its fire extinguishing products were defectively designed and posed a danger to end users and others in the stream of commerce but failed to advise Firexo of these design defects.

54. FGL knowingly, recklessly and/or negligently misrepresented its expertise and capacity to develop fire extinguishing products capable of securing UL certification within

promised timeframes or within any reasonable period of time. Furthermore, FGL, at all times relevant, was aware or should have been aware that defects in the existing design and manufacture of its products, including its .5G, 1.5G and 2.5G fire extinguishers rendered UL certification and/or listing of those products improbable. To date, UL certification or listing has not been secured for these products, which would account for the vast majority of potential sales in the United States.

55. Further, FGL knowingly, recklessly and/or negligently misrepresented the toxicity, environmental impact, and biodegradable characteristics of the chemicals used in its fire extinguishing products.

56. FGL breached its contract with Firexo by failing to provide products safe for distribution and sale in the United States.

57. FGL breached common law and statutory duties to Firexo related to the sale of goods.

58. FGL breached common law and statutory warranties, including the warranties of merchantability and fitness.

59. FGL has breached its duty of good faith and fair dealing in its business and contractual relationship with Firexo.

60. FGL made continuing false and misleading representations, and/or failed to disclose material facts, related to design defects, safety and effectiveness of its products, its professional expertise and ability to develop and manufacture safe and effective fire extinguishing products, its expertise and ability to secure UL certification, its success in securing EN3 certification, and its development of nontoxic, biodegradable, and environmentally friendly fire extinguishing products.

61. FGL's false representations and/or omissions of material facts evidenced fraud and/or misrepresentation in the inducement of a contractual and ongoing business relationship with Firexo and in the subsequent execution and pursuit of its contractual duties and business relationship.

62. FGL fraudulently and/or negligently induced Firexo to enter into a contractual and ongoing business relationship selling its fire extinguishers and fire extinguishing products in the United States.

63. Firexo relied on the false representations of FGL and its omissions of material fact to its detriment.

64. As a direct and proximate result of FGL's acts and omissions, including its acts and omissions in the design, manufacture, safety certification, distribution and sale of fire extinguishing products that were defectively designed and unsafe for use, its failure to produce UL certified or other saleable fire extinguishing products as promised, its false representations related to the extent of its expertise, qualifications, and ability to design, manufacture and secure UL certification of its products, its false representations related to EN3 certification, and its false representations related to the toxicity and environmental impact of its products, FGL has breached its common law, contractual and statutory duties to Firexo and caused Firexo to suffer permanent damage to its business relationships, industry wide reputational damage, and monetary damages that include, without limitation, investment of funds in hiring and training of personnel and subsequent development of nationwide retail and distribution relationships for the sale of FGL products, expenses incurred in the initial purchase of extinguishers that proved to be defectively designed, expenses incurred in the recall and return of defectively designed extinguishers, and the loss of past, present and future profits.

65. As a direct and proximate result of FGL's acts and omissions, including but not limited to multiple false representations that were knowingly and or negligently made and on which Firexo reasonably relied, including FGL's knowing and/or negligent failure to disclose material facts, Firexo has suffered, without limitation, reputational damage, monetary losses, past, present and future loss of profits, and ongoing incidental and consequential damages.

B. Allegations as to Firexo Corporation

66. Defendant Firexo Corporation ("Corp") is a Delaware corporation, established April 15, 2021 by David Breith, its original Director and majority shareholder. Its registered corporate agent in Delaware is Harvard Business Services Inc., located at 16192 Coastal Highway, Lewes, Delaware 19958. Corps headquarters and principal place of business are in England.

67. Breith also established several other corporate entities, all of which were located in the United Kingdom, including Firexo Limited (Firexo Limited), Firexo Motorsport Limited (Firexo Motorsport), and Firexo Holdings Limited (Firexo Holdings). Breith served as the Director of each entity and the sole shareholder of Firexo Limited and Firexo Holdings. FGL was the original sole shareholder of Firexo Motorsport. FGL became the sole shareholder of Firexo Limited on April 21, 2020, through the transfer of all of its 10,000 shares of stock.

68. On October 29, 2021, Plaintiff filed its original complaint in this matter in the Ottawa County Court of Common Pleas.

69. On November 3, 2021, Breith transferred all shares of Firexo Holdings to Corp.

70. On November 5, 2021, FGL initiated a transfer and exchange of all FGL stock to Corp through a drag along provision initiated by its majority shareholders. FGL's intellectual

property, including the patented formulas associated with FGL fire extinguishing products, were simultaneously transferred to Corp.

71. On or about October 16, 2024, Corp's CEO, David Breith, advised Corp's shareholders via email that it is in the best interests of Corp's shareholders to place FGL into creditors voluntary liquidation in England. At the time of this announcement, Corp's sole Directors were David Breith and Winand Staring, who are also the sole Directors of FGL. In addition, Breith is the majority shareholder of Corp, which in turn now owns all shares of FGL.

72. Firexo Corporation's board of directors—not FGL's directors—decided to put FGL into creditors liquidation; FGL had no independent corporate personality but functions merely as Firexo Corporation's alter ego.

73. In his email to minority shareholders, Mr. Breith wrote that "FGL's only function has been to defend legal proceedings by Firexo's former joint venture partners in the USA and Sweden." Instead of expending the financial resources necessary to defend these cases, "the board of Firexo Corporation (the ultimate Firexo holding entity which we [Firexo shareholders] all share) ... has decided that the best interests of Firexo Corporation's shareholders (and the best interests of FGL creditors) are served by placing FGL into creditors voluntary liquidation."

74. On October 10, 2024, six days before Mr. Breith's email, Corp's Directors transferred 8,600 shares of FGL's subsidiary (Firexo Motorsport Limited) out of FGL and into Firexo Holdings Limited—both of which are wholly owned by Corp (the Delaware "holding" corporation referenced in Mr. Breith's email). The shares were transferred without equivalent value.

75. Also on October 10, 2024, all 9,500 shares of Firexo Limited stock (95% of all shares) held by FGL were transferred by Corp to Firexo Holdings Limited. Firexo Limited is believed to be the operating sales and fulfillment arm for Firexo's business in the United Kingdom. Firexo Holdings Limited is a wholly owned subsidiary of Corp. These shares again were transferred without equivalent value.

76. Corp acts as the ultimate Firexo holding entity and maintains the same address, directors and officers as FGL, so that they are fundamentally indistinguishable. Notably, however, all officers and directors of all Firexo related entities, other than Breith and Staring, resigned, along with FGL's General Counsel, prior to Corp's announced plan to place FGL into liquidation and its subsequent effort to fraudulently transfer the shares of FGL's subsidiaries for the purpose of evading the claims of creditors.

77. Since the filing of Plaintiff's instant lawsuit, Corp has made conveyances of FGL's stock and assets for little or no value in violation of ORC sec. 1336.04, the Ohio Fraudulent Transfer Act.

78. Corp has exercised complete control over FGL. As a result, FGL has no independent corporate personality but instead functioned merely as Corp's alter ego.

79. The stock transfer from FGL to Corp at the end of 2021 was to the exact same shareholders, so that there was exact identity/duplication of shareholders from FGL to Corp, the ultimate holding entity, thereby making Corp a mere continuation of FGL. Officers and directors of FGL and Corp also were identical.

80. Contrary to FGL's longstanding and repeated assurances that FGL remained the manufacturer and distributor of FGL fire extinguishing products, including its admission in the answer filed by FGL in this litigation, Corp has only now revealed that FGL has effectively

been “dormant” since the share exchange, and that during this period FGL’s only function has been to defend legal proceedings brought by FGL’s former joint venture partners, including the Plaintiff in this litigation, and that all of FGL’s functions as manufacturer and distributor were assumed by Corp.

81. Corp’s creation and Corp’s control of FGL and all of its corporate activities other than defense of litigation makes Corp the alter ego of FGL and the corporate entity responsible for the fraudulent transfer of FGL’s stock and assets, warranting the piercing of FGL’s corporate veil and imposing liability on Corp for FGL’s original acts and omissions as against Plaintiff.

82. Corp was created for and has served the purposes of evading and defrauding FGL’s creditors.

83. Corp overwhelmed FGL’s corporate personality such that the separate forms between the two should be disregarded under Ohio law, allowing Firexo Inc. to reach Firexo Corporation.

84. Corp is liable for FGL’s actions in this case because (1) Corp’s control over FGL is so complete that the corporation has no separate mind, will, or existence of its own, (2) Corp’s control over FGL was exercised in such a manner as to commit fraud or an illegal act against Firexo Inc., and (3) injury or unjust loss resulted to Firexo Inc. from such control and wrong.

85. FGL has abandoned its defense in this case; however, Corp, as the mere continuation of FGL, is FGL’s successor in interest and stands in FGL’s position as an appropriate party against which Plaintiff is entitled to seek relief, making Corp the real party in interest.

86. In the alternative, the stock transfer of 2021 was an effective merger or consolidation of Corp with FGL.

87. In the alternative, Corp, either expressly or impliedly, assumed the liabilities of FGL.

III. CLAIMS FOR RELIEF

A. As Against FGL

88. Plaintiff restates the foregoing allegations as if fully rewritten.

89. FGL's acts and omissions give rise to a claim for breach of contract, including but not limited to breach of the duty of good faith.

90. FGL's acts and omissions give rise to a claim for breach of the warranties of merchantability and fitness.

91. FGL's acts and omissions give rise to claims for misrepresentation, fraud in the inducement, and negligent and/or knowing misrepresentation aimed at inducing and continuing a business and contractual relationship with plaintiff.

92. FGL's acts and omissions give rise to claims for unjust enrichment.

B. As Against Corp

93. Plaintiff restates the foregoing allegations as if fully rewritten.

94. Corp, as a mere continuation of FGL and as FGL's alter ego, is liable for FGL's wrongful acts and omissions referenced in Count 1.

95. Alternatively, Corp was created in an effort to defraud FGL's creditors and must stand in FGL's place in this litigation and is liable for FGL's wrongful acts and omissions referenced in Count 1.

96. Corp, in control over FGL, fraudulently transferred FGL's assets out of FGL for little or no value to wrongfully prevent Plaintiff, and others, from rightfully collecting judgment

against FGL, so that Corp is liable to Plaintiff for Corp's misconduct and FGL's referenced wrongful acts and omissions.

97. Alternatively, the stock transfer of 2021 was an effective merger or consolidation of Corp with FGL so that Corp must stand in FGL's place in this litigation, and is liable for FGL's wrongful acts and omissions referenced in Count 1.

98. Alternatively, Corp, either expressly or impliedly, assumed the liabilities of FGL so that Corp must stand in FGL's place in this litigation, and is liable for FGL's wrongful acts and omissions referenced in Count 1.

IV. PRAYER FOR RELIEF

Wherefore, plaintiff prays for an award of damages in an amount to be proven at trial, together with punitive damages, attorneys' fees, the costs of these proceedings, and any other relief that may be just and equitable.

Respectfully submitted,

/s/ Paul T. Belazis

Paul T. Belazis
Joseph P. Dawson
Counsel for Plaintiff Firexo, Inc.

JURY DEMAND

Plaintiff hereby demands trial by jury of all issues and claims so triable.

/s/ Paul T. Belazis

Paul T. Belazis

CERTIFICATE OF SERVICE

This is to certify that a copy of the forgoing Second Amended Complaint was served on all counsel of record by operation of the Court's electronic filing system this ____ day of _____ 2024.

/s/ Paul T. Belazis

Paul T. Belazis

EXHIBIT B

**EMAIL DATED OCTOBER 16, 2024 OF DAVID BREITH
TO FIREXO CORP. SHAREHOLDERS**

From: Dave Breith <dave.breith@firexo.com>
Date: October 16, 2024 at 1:31:13 AM EDT
To: Dave Breith <dave.breith@firexo.com>
Subject: Update

Dear Shareholder,

I am sorry it has been such a long time since I reported to you.

I have some news I need to share about Firexo Group Limited (“FGL”). As you know FGL is the entity in which we all used to hold our shares prior to the Share Exchange Agreements with Firexo Corporation on 5 November 2021. FGL has effectively been dormant since the share exchange. During this period FGL’s only function has been to defend legal proceedings brought by Firexo’s former joint venture partners in the USA and Sweden; two sets of proceedings in Ohio and one High Court action in London.

This is not the forum to share details about the three legal cases; it suffices to say that the advice the business has received since day one (from two firms of solicitors and from two Kings Counsel) is that all of the claims will be defended successfully and Firexo should expect a very significant recovery of legal costs from the Claimants when the proceedings have concluded. To put some context around this, the legal costs incurred by FGL in defending these proceedings to date are already north of £800,000.

The legal proceedings have been a huge cash drain for the business, but that drain on cash is about to accelerate. FGL will have to pay our London based lawyers just under £230,000 to deal with FGL’s documentary disclosure obligations between now and Christmas and, thereafter, another £1,100,000 to defend the High Court case all the way to trial in Q1 of 2026. This litigation has put an intolerable strain on business cashflow – cash which could obviously be put to much better use for the benefit of us all.

In these circumstances, the board of Firexo Corporation (the ultimate Firexo holding entity which we all share) has decided to forfeit the expectation of a substantial recovery of legal costs at the conclusion of the litigation. Instead, it has decided that the best interests of Firexo Corporation’s shareholders (and the best interests of FGL creditors) are served by placing FGL into creditors voluntary liquidation.

THIS DECISION DOES NOT IN ANY WAY AFFECT THE VALUE OF YOUR SHAREHOLDING IN FIREXO CORPORATION. FIREXO CORPORATION’S BOARD WILL CONTINUE TO GIVE ITS ALL IN NAVIGATING THE BUSINESS TOWARDS A SUCCESSFUL EXIT FOR ALL OF US.

I will update you further on this topic over the coming weeks, where I am able to, and I also plan to deliver a more substantial business update to you all in January 2025 or sooner if possible.

Yours faithfully

Dave Breith
CEO

EXHIBIT C

**CURRENT DIRECTORS REPORT OF FIREXO GROUP
LIMITED AND FIREXO CORPORATION AND CONFIRMATION
STATEMENTS OF FIREXO GROUP LIMITED**



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FIREXO GROUP LIMITED

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BREITH, David

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, England, HP6 6FA

Role Active **Director**

Date of birth **August 1969**

Appointed on **5 March 2018**

Nationality **British**

Country of residence **United Kingdom**

Occupation **Senior Management**

STARING, Winand Damiaan Evert, Dr

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, England, HP6 6FA

Role Active **Director**

Date of birth **March 1948**

Appointed on **7 January 2021**

Nationality **Dutch**

Country of residence **Qatar**

Occupation **Group Chairman**

COYLE, Peter James

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, England, HP6 6FA

Role Resigned **Secretary**

RESIGNATION ENTERED AT COMPANIES HOUSE ON AUGUST 28,

Appointed on **22 August 2018**

2024. See <https://tinyurl.com/4bckyh4r>

Resigned on **31 July 2024**

BALDWIN, Gareth Paul Stanley

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, England, HP6 6FA

Role Resigned **Director**

Date of birth **November 1979**

Appointed on **4 April 2019**

Resigned on **18 September 2023**

Nationality **British**

Country of residence **England**

Occupation **Operations Director**

CALLE, David Graeme

Correspondence address

1 Chalfont Park, Chalfont St. Peter, Gerrards Cross, United Kingdom, SL9 0BG

Role Resigned **Director**

Date of birth **October 1964**

Appointed on **28 November 2017**

Resigned on **5 March 2018**

Nationality **British**

Country of residence **England**

Occupation **Director**

PARISH, Robert Kenneth Martin

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, England, HP6 6FA

Role Resigned **Director**

Date of birth **January 1982**

Appointed on **17 September 2018**

Resigned on **21 April 2020**

Nationality **British**

Country of residence **England**

Occupation **Director**

STEWART, Nichola Louise

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, England, HP6 6FA

Role Resigned **Director**

Date of birth **January 1969**

Appointed on **6 March 2019**

Resigned on **21 April 2020**

Nationality **British**

Country of residence **England**

Occupation **Sales Director**

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FIREXO CORPORATION

Company number **FC039424**

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BREITH, David

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, United Kingdom, HP6 6FA

Role **Active** **Director**

Date of birth **August 1969**

Appointed on **19 April 2022**

Nationality **British**

Country of residence **United Kingdom**

Occupation Senior Management

STARING, Winand Damiaan Evert

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, United Kingdom, HP6 6FA

Role Active **Director**

Date of birth **March 1948**

Appointed on **19 April 2022**

Nationality **Dutch**

Country of residence **Qatar**

Occupation **Group Chairman**

COYLE, Peter James

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, United Kingdom, HP6 6FA

Role Resigned **Secretary**

**RESIGNATION ENTERED AT
COMPANIES HOUSE ON
SEPTEMBER 17, 2024**

See <https://tinyurl.com/23nnhe87>

Appointed on **19 April 2022**

Resigned on **31 July 2024**

BALDWIN, Gareth Paul Stanley

Correspondence address

Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, United Kingdom, HP6 6FA

Role Resigned **Director**

Date of birth **November 1979**

Appointed on **19 April 2022**

Resigned on **18 September 2023**

Nationality **British**

Country of residence **England**

Occupation **Operations Director**

WARD, Paula

Correspondence address
Coyle White Devine, Boughton Business Park, Bell Lane, Amersham, Buckinghamshire, United Kingdom, HP6 6FA

Role Resigned **Director**

Date of birth **September 1979**

Appointed on **19 April 2022**

Resigned on **31 July 2024**

Nationality **British**

NOTE: RESIGNATION ENTERED AT COMPANIES HOUSE ON OCTOBER 1, 2024. See <https://tinyurl.com/23nnhe87>

Country of residence **United Kingdom**

Occupation **None**

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Confirmation Statement

Company Name: **FIREXO GROUP LIMITED**

Company Number: **11085973**



Received for filing in Electronic Format on the: **06/12/2022**

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Company Name: **FIREXO GROUP LIMITED**

Company Number: **11085973**

Confirmation **27/11/2022**

Statement date:

Full details of Shareholders

The details below relate to individuals/corporate bodies that were shareholders during the review period or that had ceased to be shareholders since the date of the previous confirmation statement.

Shareholder information for a non-traded company as at the confirmation statement date is shown below

Shareholding 1:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	ALEXANDER CHARLES ABBEY
Shareholding 2:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	JUSTINE ANNE ACKROYD
Shareholding 3:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	DANIEL RICHARD AHNER
Shareholding 4:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	STUART ALEXANDER
Shareholding 5:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	IDRIS ALI
Shareholding 6:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	NAFEESA ALI
Shareholding 7:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	SHaida ALI
Shareholding 8:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	ALAN RICHARD ANDERSON
Shareholding 9:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	MARK STEVEN ANDREWS
Shareholding 10:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	PAUL ALAN ANDREWS
Shareholding 11:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	MICHAEL ANTONIO
Shareholding 12:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	RENATE ANTONIO
Shareholding 13:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	VERONICA CHRISTINA ANTONIO
Shareholding 14:	0 ORDINARY shares held as at the date of this confirmation statement
Name:	TYRONE ROGER APPLEBY

Shareholding 15:	0 ORDINARY shares held as at the date of this confirmation statement IMRAN ASGHAR
Shareholding 16:	0 ORDINARY shares held as at the date of this confirmation statement NICK ASHTON
Shareholding 17:	0 ORDINARY shares held as at the date of this confirmation statement REBECCA ANGHARAD ASHTON
Shareholding 18:	0 ORDINARY shares held as at the date of this confirmation statement CAROL KAR LOK BAGARY
Shareholding 19:	0 ORDINARY shares held as at the date of this confirmation statement KALWINDER SINGH BAGARY
Shareholding 20:	0 ORDINARY shares held as at the date of this confirmation statement RAJROOP BAGARY
Shareholding 21:	0 ORDINARY shares held as at the date of this confirmation statement DONNA BAINBRIDGE
Shareholding 22:	0 ORDINARY shares held as at the date of this confirmation statement ARVIN BAINS
Shareholding 23:	0 ORDINARY shares held as at the date of this confirmation statement DAVID TOM BAKER
Shareholding 24:	0 ORDINARY shares held as at the date of this confirmation statement DEENA LORRAINE BALDWIN
Shareholding 25:	0 ORDINARY shares held as at the date of this confirmation statement GARETH PAUL STANLEY BALDWIN
Shareholding 26:	0 ORDINARY shares held as at the date of this confirmation statement MARK ALAN BALDWIN
Shareholding 27:	0 ORDINARY shares held as at the date of this confirmation statement STANLEY IVOR BALDWIN
Shareholding 28:	0 ORDINARY shares held as at the date of this confirmation statement THOMAS EDWARD BALDWIN
Shareholding 29:	0 ORDINARY shares held as at the date of this confirmation statement STEPHEN BANFIELD
Shareholding 30:	0 ORDINARY shares held as at the date of this confirmation statement CARL BARLOW
Shareholding 31:	0 ORDINARY shares held as at the date of this confirmation statement

Shareholding 32: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DANIEL BARRETT**

Shareholding 33: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JAMES BASNETT**

Shareholding 34: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CENTELIA BELL-BISHOP**

Shareholding 35: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **KIM VALERIE BENNETT**

Shareholding 36: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **FRANCIS MARK BINNINGTON**

Shareholding 37: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **YVONNE JANE BINNINGTON**

Shareholding 38: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **TREVOR THOMAS BISWELL**

Shareholding 39: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **AARON JACK BLAIR**

Shareholding 40: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **AMY JANE BLAIR**

Shareholding 41: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CONNOR JASON BLAIR**

Shareholding 42: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NICOLA JANE BLAIR**
GARY BLAIR

Shareholding 43: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NICOLA JANE BLAIR**

Shareholding 44: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **STELLA BOND**

Shareholding 45: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **WAYNE BOOTH**

Shareholding 46: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RACHEL BOOTHROYD**

Shareholding 47: **0 ORDINARY shares held as at the date of this confirmation statement**

Shareholding 48: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NEIL CHARLES BOWERMAN**

Shareholding 49: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CLAIRE BREITH**

Shareholding 50: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DAVID BREITH**

Shareholding 51: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **VINCENT DONALD BROOKS**

Shareholding 52: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **COLIN BERNARD BROWN**

Shareholding 53: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JUSTIN BROWN**

Shareholding 54: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **FRANS JAN BURKENS**

Shareholding 55: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOHN BURNESS**

Shareholding 56: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DIANE BUTLER**

Shareholding 57: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **KENNETH CAIRNS**

Shareholding 58: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LAURA MARIE CAMPBELL**

Shareholding 59: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MICHELLE CARPENTER-HANSON**

Shareholding 60: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NICHOLAS CHANNER**

Shareholding 61: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DANIEL CHAPPELL**

Shareholding 62: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ABDUL AMIN CHOUDHURY**

Shareholding 63: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RACHEL LOUISE CLARK**

Shareholding 64:	0 ORDINARY shares held as at the date of this confirmation statement SARAH CLARKE
Shareholding 65:	0 ORDINARY shares held as at the date of this confirmation statement JASON CLIFFORD
Shareholding 66:	0 ORDINARY shares held as at the date of this confirmation statement JAMES COUSER
Shareholding 67:	0 ORDINARY shares held as at the date of this confirmation statement SIR CLIVE COWDERY
Shareholding 68:	0 ORDINARY shares held as at the date of this confirmation statement THERESA COWLEY
Shareholding 69:	0 ORDINARY shares held as at the date of this confirmation statement BRENDA VIVIAN COX
Shareholding 70:	0 ORDINARY shares held as at the date of this confirmation statement CHRISTOPHER COYLE
Shareholding 71:	0 ORDINARY shares held as at the date of this confirmation statement PETER COYLE
Shareholding 72:	0 ORDINARY shares held as at the date of this confirmation statement MARTYNE COYLE PETER COYLE
Shareholding 73:	0 ORDINARY shares held as at the date of this confirmation statement LESTER WILLIAM CRAWFORD
Shareholding 74:	0 ORDINARY shares held as at the date of this confirmation statement CREATE.IF GROUP LIMITED
Shareholding 75:	0 ORDINARY shares held as at the date of this confirmation statement SHAUN PATRICK CROSS
Shareholding 76:	0 ORDINARY shares held as at the date of this confirmation statement PAUL DARWIN
Shareholding 77:	0 ORDINARY shares held as at the date of this confirmation statement ANTONY DAY
Shareholding 78:	0 ORDINARY shares held as at the date of this confirmation statement RACHEL BOWES DEMPERS
Shareholding 79:	0 ORDINARY shares held as at the date of this confirmation statement RICHARD WILLIAM DEMPERS

Shareholding 80: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROSEMARY ANN DEMPERS**

Shareholding 81: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **THOMAS DESBOROUGH**

Shareholding 82: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOE DETTMER**

Shareholding 83: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MICHAEL DEXTER**

Shareholding 84: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JULIAN DIAZ-RAINEY**

Shareholding 85: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **SUSANNAH DONALDSON**

Shareholding 86: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MARK ELBERFIELD**

Shareholding 87: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CAMERON ELLIS**

Shareholding 88: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JACQUELINE LOUISE ETHERINGTON**

Shareholding 89: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **TERENCE WILLIAM ETHERINGTON**

Shareholding 90: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ENIS EVLAT**

Shareholding 91: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROSE EVLAT**

Shareholding 92: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **KRISTOPHER G FABI**

Shareholding 93: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LOURDES FABI**
PERRY FABI

Shareholding 94: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **PERRY GOLLAYAN FABI, JR**

Shareholding 95: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CAROLE FAN**

Shareholding 96:	0 ORDINARY shares held as at the date of this confirmation statement KENNETH CHRISTOPHER FARLEY
Shareholding 97:	0 ORDINARY shares held as at the date of this confirmation statement JONATHAN KENNETH GEORGE FARLEY
Shareholding 98:	0 ORDINARY shares held as at the date of this confirmation statement DAWN FARR
Shareholding 99:	0 ORDINARY shares held as at the date of this confirmation statement PETER FARRELL
Shareholding 100:	0 ORDINARY shares held as at the date of this confirmation statement CHARLES FRAZER FEARNHEAD
Shareholding 101:	0 ORDINARY shares held as at the date of this confirmation statement GARY FIXTER
Shareholding 102:	0 ORDINARY shares held as at the date of this confirmation statement ISOBEL FIXTER GARY FIXTER
Shareholding 103:	0 ORDINARY shares held as at the date of this confirmation statement ISOBEL FIXTER
Shareholding 104:	0 ORDINARY shares held as at the date of this confirmation statement NEIL DAVID FLYNN
Shareholding 105:	0 ORDINARY shares held as at the date of this confirmation statement KRISTINA FRANEK JOSHUA FRANEK
Shareholding 106:	0 ORDINARY shares held as at the date of this confirmation statement THOMAS FRANEK ROSALIE FRANEK
Shareholding 107:	0 ORDINARY shares held as at the date of this confirmation statement FIREXO GROUP LIMITED
Shareholding 108:	0 ORDINARY shares held as at the date of this confirmation statement STEPHEN LESLIE FRY
Shareholding 109:	0 ORDINARY shares held as at the date of this confirmation statement GRAHAM FULFORD
Shareholding 110:	0 ORDINARY shares held as at the date of this confirmation statement DAVID GARDNER
Shareholding 111:	0 ORDINARY shares held as at the date of this confirmation statement

Shareholding 112: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROSIE GARDNER**

Shareholding 113: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JON GILDEA**

Shareholding 114: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MARK GILHAM**

Shareholding 115: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LEWIS ROGER GILL**
MERIEL WENDY GILL

Shareholding 116: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **HUGO MARK GLEED**

Shareholding 117: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **STEPHEN GOODMAN**

Shareholding 118: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RUTH JOANNE GORMAN**

Shareholding 119: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **OLIVER DAVID GREEN**

Shareholding 120: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **GULNAZ GULZAR**

Shareholding 121: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MENAAZ GULZAR**

Shareholding 122: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **UMAR SHERAZ GULZAR**

Shareholding 123: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **KAREN DENISE GUMB**

Shareholding 124: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NINA MARIE HAASE**

Shareholding 125: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ALAN HALL**

Shareholding 126: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **VIVIENNE HALLACK**

Shareholding 127: **0 ORDINARY shares held as at the date of this confirmation statement**

Shareholding 128: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **BENJAMIN JAMES HARRIS**

Shareholding 129: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **VICTORIA LOUISE HARRIS**

Shareholding 130: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **AATIF HASSAN**

Shareholding 131: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NICHOLA LOUISE HAY**

Shareholding 132: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **GARY HEARN**

Shareholding 133: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROSALIND HEBBURN**

Shareholding 134: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LAMONT ANTHONY HECTOR**

Shareholding 135: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **GRANT WILLIAM HENRY**

Shareholding 136: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **HAYLEY HENRY**

Shareholding 137: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LILLY HENRY**

Shareholding 138: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MICHAEL BRADLEY HENRY**

Shareholding 139: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MILLIE HENRY**

Shareholding 140: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **PAUL HETHERINGTON**

Shareholding 141: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CATHERINE HEYS**

Shareholding 142: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOANI HICKMAN**

Shareholding 143: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHRISTOPHER MICHAEL HILL**

Shareholding 144: Name:	0 ORDINARY shares held as at the date of this confirmation statement SPENCER HILLIER
Shareholding 145: Name:	0 ORDINARY shares held as at the date of this confirmation statement BARRY HODSON
Shareholding 146: Name:	0 ORDINARY shares held as at the date of this confirmation statement DONNA MARIE HODSON
Shareholding 147: Name:	0 ORDINARY shares held as at the date of this confirmation statement KATHY HOGAN
Shareholding 148: Name:	0 ORDINARY shares held as at the date of this confirmation statement TOM HOGAN
Shareholding 149: Name:	0 ORDINARY shares held as at the date of this confirmation statement ELSPETH ELIZABETH HOLMES
Shareholding 150: Name:	0 ORDINARY shares held as at the date of this confirmation statement RICHARD DANIEL HOLMES
Shareholding 151: Name:	0 ORDINARY shares held as at the date of this confirmation statement JESSICA DANIELLE HOLT
Shareholding 152: Name:	0 ORDINARY shares held as at the date of this confirmation statement JULIAN HOLT
Shareholding 153: Name:	0 ORDINARY shares held as at the date of this confirmation statement CARLIE EMMA HOMER
Shareholding 154: Name:	0 ORDINARY shares held as at the date of this confirmation statement LEE HOOPER
Shareholding 155: Name:	0 ORDINARY shares held as at the date of this confirmation statement ABBIE MAY HOPKINS
Shareholding 156: Name:	0 ORDINARY shares held as at the date of this confirmation statement CARLIE SAMANTHA HOPKINS
Shareholding 157: Name:	0 ORDINARY shares held as at the date of this confirmation statement MARK HOPPENBROUWERS
Shareholding 158: Name:	0 ORDINARY shares held as at the date of this confirmation statement ROBERT HORSNALL
Shareholding 159: Name:	0 ORDINARY shares held as at the date of this confirmation statement GINA HOUSTON
Shareholding 160:	0 ORDINARY shares held as at the date of this confirmation statement

Shareholding 161: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RHYS HOWARD**

Shareholding 162: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHRISTOPHER JOHN HOWE**

Shareholding 163: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **STEVEN WILLIAM HOWE**

Shareholding 164: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RYAN HOYTE**

Shareholding 165: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **HUIBERT J HUDIG**

Shareholding 166: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MAIREAD HUGHES**

Shareholding 167: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MARTIN HULSE**

Shareholding 168: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **SIMON HURRELL**

Shareholding 169: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **EDDIE HUTCHINSON**

Shareholding 170: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JAKPON LIMITED**

Shareholding 171: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHRISTINA ILONKA JANSEN**

Shareholding 172: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ANDREW JARVIS**

Shareholding 173: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JUSTIN JEFFREY**

Shareholding 174: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RUTH JEFFREY**

Shareholding 175: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RUTH JEFFREY**
JUSTIN JEFFREY

Shareholding 176: **0 ORDINARY shares held as at the date of this confirmation statement**

Shareholding 177: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **BEN JEWELL**

Shareholding 178: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **TONI JEWELL**

Shareholding 179: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NICHOLAS PAUL JURD**

Shareholding 180: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ANNABEL JULIA KEARNEY**

Shareholding 181: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **THOMAS KEARNEY**

Shareholding 182: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RACHEL KEARNEY-OWEN**

Shareholding 183: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MIKE KELLY**

Shareholding 184: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOHN KEMP**

Shareholding 185: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JULIE ANN KENNY**

Shareholding 186: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NATALIA KUDRYASHOVA**

Shareholding 187: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **TOM LANT**

Shareholding 188: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JON LATTIN**

Shareholding 189: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **BEVERLEY LEGOOD**

Shareholding 190: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **IAN LEECH**

Shareholding 191: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHRISTOPHER ANTHONY LETHEREN**

Shareholding 192: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DAPHNE ELIZABETH LETHEREN**

Shareholding 193: Name:	0 ORDINARY shares held as at the date of this confirmation statement PETER ANTHONY LETHEREN
Shareholding 194: Name:	0 ORDINARY shares held as at the date of this confirmation statement MATTHEW J. LEWIS
Shareholding 195: Name:	0 ORDINARY shares held as at the date of this confirmation statement JESSICA LINDVALL
Shareholding 196: Name:	0 ORDINARY shares held as at the date of this confirmation statement LIVEM LTD
Shareholding 197: Name:	0 ORDINARY shares held as at the date of this confirmation statement EMMA LOUISE LOCKING
Shareholding 198: Name:	0 ORDINARY shares held as at the date of this confirmation statement PAUL MARTIN LOCKING
Shareholding 199: Name:	0 ORDINARY shares held as at the date of this confirmation statement PHILIP MAREK LUZAR
Shareholding 200: Name:	0 ORDINARY shares held as at the date of this confirmation statement ANNABELLE MADZIA
Shareholding 201: Name:	0 ORDINARY shares held as at the date of this confirmation statement KAREN MADZIA
Shareholding 202: Name:	0 ORDINARY shares held as at the date of this confirmation statement LUKE MADZIA
Shareholding 203: Name:	0 ORDINARY shares held as at the date of this confirmation statement NADEZDA MAKAROVA
Shareholding 204: Name:	0 ORDINARY shares held as at the date of this confirmation statement NATALIYA MAKAROVA-SKEANS
Shareholding 205: Name:	0 ORDINARY shares held as at the date of this confirmation statement BINA MALDE
Shareholding 206: Name:	0 ORDINARY shares held as at the date of this confirmation statement CAROL MALEM
Shareholding 207: Name:	0 ORDINARY shares held as at the date of this confirmation statement DANIEL MALEM
Shareholding 208: Name:	0 ORDINARY shares held as at the date of this confirmation statement HAROLD MALEM
Shareholding 209:	0 ORDINARY shares held as at the date of this confirmation statement

Shareholding 210: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHRISTOPHER BENJAMIN MANN**

Shareholding 211: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **COLIN MARKS**

Shareholding 212: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **GLEN ROBERT MARRIOTT**

Shareholding 213: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JUAN ELIAS MARZANA**

Shareholding 214: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **VICTORIA HAYLEY MARZANA**

Shareholding 215: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MICHAEL MASON**

Shareholding 216: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **TRACEY MAUNDER**

Shareholding 217: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ALAN ARTHUR MAYLOR**
VALERIE MAYLOR

Shareholding 218: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DAWN MCDERMOTT**

Shareholding 219: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **BRANDAN MCGEE**

Shareholding 220: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **KIERON MCKAY**

Shareholding 221: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DANIEL MCNAB**

Shareholding 222: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOHN MCNAB**

Shareholding 223: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MATTHEW MCNAB**

Shareholding 224: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DAVID MCQUADE**

Shareholding 225: **0 ORDINARY shares held as at the date of this confirmation statement**

Shareholding 226: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ALAN MILEHAM**

Shareholding 227: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHANTELLE CHELSEA MILES**

Shareholding 228: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JAMES GEORGE MILES**

Shareholding 229: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **TONI-ANNE MILES**

Shareholding 230: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ALISTAIR K. MILLER**

Shareholding 231: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **COURTNEY LISA MILLS**
JORDAN PETER THOMAS

Shareholding 232: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **SPENCER ALEXANDER MILTON**

Shareholding 233: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NATALIA MISKO**

Shareholding 234: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CONNOR BERNARD FRANK MORAN**

Shareholding 235: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MARCUS KAISER MORGAN**

Shareholding 236: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **PAMELA MORRIS**

Shareholding 237: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOHN MUNDELL**

Shareholding 238: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **PHILLIP JOHN MURCH**

Shareholding 239: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ADRIAN MURPHY**

Shareholding 240: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JANE ELIZABETH MARY MURPHY**

Shareholding 241: **0 ORDINARY shares held as at the date of this confirmation statement**

Shareholding 242: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ANNA NAYLOR**

Shareholding 243: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **AHMED NIAZI**

Shareholding 244: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **KARL ADAM NITSCHE**

Shareholding 245: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LESLEY NITSCHE**

Shareholding 246: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **IAN DENNIS NOBLE**

Shareholding 247: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ANN MARIE NOKE**

Shareholding 248: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROBERT NOKE**

Shareholding 249: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **STEPHEN NOKE**

Shareholding 250: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **BOZIDAR NOVAKOVIC**

Shareholding 251: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **KAREN NUNN**

Shareholding 252: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LOUISE O'DELL**

Shareholding 253: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ANNA HEIDI OTTERY**

Shareholding 254: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MARTYN OTTERY**

Shareholding 255: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **STEPHEN OXLEY**

Shareholding 256: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROBERT PARISH**

Shareholding 257: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **EMILY PARKER**

Shareholding 258: Name:	0 ORDINARY shares held as at the date of this confirmation statement JAMES PARR
Shareholding 259: Name:	0 ORDINARY shares held as at the date of this confirmation statement KATRINA PARR
Shareholding 260: Name:	0 ORDINARY shares held as at the date of this confirmation statement JAMES PASSMORE
Shareholding 261: Name:	0 ORDINARY shares held as at the date of this confirmation statement LORNA CATHERINE PASSMORE
Shareholding 262: Name:	0 ORDINARY shares held as at the date of this confirmation statement STEVEN DAVID PASSMORE
Shareholding 263: Name:	0 ORDINARY shares held as at the date of this confirmation statement RICHARD NICHOLAS GEORGE PAVRY
Shareholding 264: Name:	0 ORDINARY shares held as at the date of this confirmation statement JAMES EDWARD PEARCE
Shareholding 265: Name:	0 ORDINARY shares held as at the date of this confirmation statement ERIN CULLEN PETROVIC
Shareholding 266: Name:	0 ORDINARY shares held as at the date of this confirmation statement MAYA CULLEN PETROVIC
Shareholding 267: Name:	0 ORDINARY shares held as at the date of this confirmation statement JAN PETTYFER
Shareholding 268: Name:	0 ORDINARY shares held as at the date of this confirmation statement DANIEL PHILLIPS
Shareholding 269: Name:	0 ORDINARY shares held as at the date of this confirmation statement ANGELA MARIA PIDSLEY
Shareholding 270: Name:	0 ORDINARY shares held as at the date of this confirmation statement BRIAN JOHN PIDSLEY
Shareholding 271: Name:	0 ORDINARY shares held as at the date of this confirmation statement PETER PONTON
Shareholding 272: Name:	0 ORDINARY shares held as at the date of this confirmation statement JONATHAN DAVID POOLE
Shareholding 273: Name:	0 ORDINARY shares held as at the date of this confirmation statement SAMUEL QUINN
Shareholding 274:	0 ORDINARY shares held as at the date of this confirmation statement

Shareholding 275: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROGER GARY RAWLINSON**

Shareholding 276: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOHN CAIRNS READ**

Shareholding 277: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **EMMA REDMAN**

Shareholding 278: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MARTIN WILLIAM REDMAN**

Shareholding 279: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROBERT REDMAN**

Shareholding 280: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **PAUL REEVES**

Shareholding 281: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **STEPHEN JOHN REIN**

Shareholding 282: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MICHAEL RICCI**

Shareholding 283: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **TRACEY RICCI**

Shareholding 284: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DAVID RIDGWAY**

Shareholding 285: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RJS VENTURES LLC**

Shareholding 286: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOE ROBERTS**

Shareholding 287: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MATTHEW ROBINSON**

Shareholding 288: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **FIONA ROONEY**

Shareholding 289: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **NICHOLAS ROONEY**

Shareholding 290: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **VICTORIA JANE ROWLAND**

Shareholding 291: Name:	0 ORDINARY shares held as at the date of this confirmation statement JONATHAN RYAN
Shareholding 292: Name:	0 ORDINARY shares held as at the date of this confirmation statement REBECCA SADLER
Shareholding 293: Name:	0 ORDINARY shares held as at the date of this confirmation statement JAGROOP KAUR SAHI
Shareholding 294: Name:	0 ORDINARY shares held as at the date of this confirmation statement AMANDA SCORER MICHAEL SCORER
Shareholding 295: Name:	0 ORDINARY shares held as at the date of this confirmation statement DAVID SCOT
Shareholding 296: Name:	0 ORDINARY shares held as at the date of this confirmation statement RICHARD PHILLIP SEARLE
Shareholding 297: Name:	0 ORDINARY shares held as at the date of this confirmation statement KEVIN SHAKLES
Shareholding 298: Name:	0 ORDINARY shares held as at the date of this confirmation statement BARRY BURNS SHEAHAN
Shareholding 299: Name:	0 ORDINARY shares held as at the date of this confirmation statement DAVID NORMAN SHEAHAN
Shareholding 300: Name:	0 ORDINARY shares held as at the date of this confirmation statement ELLOUISE SHEAHAN
Shareholding 301: Name:	0 ORDINARY shares held as at the date of this confirmation statement PETER SHEAHAN
Shareholding 302: Name:	0 ORDINARY shares held as at the date of this confirmation statement SALLY SHEPHARD
Shareholding 303: Name:	0 ORDINARY shares held as at the date of this confirmation statement SUE SHEPHARD
Shareholding 304: Name:	0 ORDINARY shares held as at the date of this confirmation statement SHIRLEY MARGARET SHORTER
Shareholding 305: Name:	0 ORDINARY shares held as at the date of this confirmation statement DIANA SIMMONDS
Shareholding 306: Name:	0 ORDINARY shares held as at the date of this confirmation statement HAYLEY SIMMONDS

Shareholding 307: Name:	0 ORDINARY shares held as at the date of this confirmation statement MARK SMITH
Shareholding 308: Name:	0 ORDINARY shares held as at the date of this confirmation statement SCOT SMITH
Shareholding 309: Name:	0 ORDINARY shares held as at the date of this confirmation statement WENDY SOUTH
Shareholding 310: Name:	0 ORDINARY shares held as at the date of this confirmation statement PETER SPARGO
Shareholding 311: Name:	0 ORDINARY shares held as at the date of this confirmation statement MARK SPRING
Shareholding 312: Name:	0 ORDINARY shares held as at the date of this confirmation statement WINAND D E STARING
Shareholding 313: Name:	0 ORDINARY shares held as at the date of this confirmation statement ROBERT LINDSAY STEVENSON
Shareholding 314: Name:	0 ORDINARY shares held as at the date of this confirmation statement SAMUEL LINDSAY STEVENSON
Shareholding 315: Name:	0 ORDINARY shares held as at the date of this confirmation statement ROBERT ANDREW STEWART
Shareholding 316: Name:	0 ORDINARY shares held as at the date of this confirmation statement ERIKA STRATFORD
Shareholding 317: Name:	0 ORDINARY shares held as at the date of this confirmation statement CONNOR SEAN STUART
Shareholding 318: Name:	0 ORDINARY shares held as at the date of this confirmation statement ALAN JAMES MARTIN SUNDERLAND
Shareholding 319: Name:	0 ORDINARY shares held as at the date of this confirmation statement PAUL SWEETLAND
Shareholding 320: Name:	0 ORDINARY shares held as at the date of this confirmation statement JOSEPH SYKES
Shareholding 321: Name:	0 ORDINARY shares held as at the date of this confirmation statement TRACY SYKES
Shareholding 322: Name:	0 ORDINARY shares held as at the date of this confirmation statement LEWIS TALMER
Shareholding 323:	0 ORDINARY shares held as at the date of this confirmation statement

Shareholding 324: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **IAN TEADER**

Shareholding 325: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ELSBETH HINKE TER HAAR-BLEEKER**

Shareholding 326: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHARLOTTE TERRY**

Shareholding 327: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MARTIN DAVID THOMAS**

Shareholding 328: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ANDREA JEAN THORNTON**
MICHAEL DAMIEN THORNTON

Shareholding 329: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DAVID JOHN THORNTON**

Shareholding 330: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **KATHRYN LOUISE THORNTON**

Shareholding 331: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MARK DAMIEN THORNTON**

Shareholding 332: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LEE TIMBERLAKE**

Shareholding 333: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **KAREN TURNER**

Shareholding 334: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CLINTON ROBERT WILLIAM TURRINGTON**

Shareholding 335: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **BRIAN ANDREW TURVEY**

Shareholding 336: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **MICHAEL VAN KLINK**

Shareholding 337: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **PAUL VLISSIDIS**

Shareholding 338: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHARLOTTE WALKER**

Shareholding 339: **0 ORDINARY shares held as at the date of this confirmation statement**

Shareholding 340: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JASMINE LISA WALTON**

Shareholding 341: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JULIE WALTON**

Shareholding 342: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **RORY KENNEDY WALTON**

Shareholding 343: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LEE ADAM WANSTALL**

Shareholding 344: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LINDA WANSTALL**

Shareholding 345: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **TROY WANSTALL**

Shareholding 346: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **TRACEY WASPE**

Shareholding 347: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ANNETTE JANE WEBB**

Shareholding 348: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHRISTOPHER JOHN WEBB**

Shareholding 349: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **LUKE ANTHONY WEBB**

Shareholding 350: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROY DANIEL WEBB**

Shareholding 351: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHRIS WESTON**

Shareholding 352: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **DONNA WHEABLE**

Shareholding 353: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JACK CALLUM WHEABLE**

Shareholding 354: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **WHEABLE JOHN**

Shareholding 355: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOHN FREDERICK WHEABLE**

Shareholding 356: Name:	0 ORDINARY shares held as at the date of this confirmation statement MILLIE MAY WHEABLE
Shareholding 357: Name:	0 ORDINARY shares held as at the date of this confirmation statement YVONNE WHEABLE
Shareholding 358: Name:	0 ORDINARY shares held as at the date of this confirmation statement ADRIAN JUSTIN WHITE
Shareholding 359: Name:	0 ORDINARY shares held as at the date of this confirmation statement ANDREW JOHN WHITE
Shareholding 360: Name:	0 ORDINARY shares held as at the date of this confirmation statement FLEUR CAROLINE WHITE
Shareholding 361: Name:	0 ORDINARY shares held as at the date of this confirmation statement HOLLIE WHITING
Shareholding 362: Name:	0 ORDINARY shares held as at the date of this confirmation statement ROCKY WHITING
Shareholding 363: Name:	0 ORDINARY shares held as at the date of this confirmation statement MARTYN WHYTE
Shareholding 364: Name:	0 ORDINARY shares held as at the date of this confirmation statement GEORGE ALEX WILLIAMS
Shareholding 365: Name:	0 ORDINARY shares held as at the date of this confirmation statement JULIE WILLIAMS
Shareholding 366: Name:	0 ORDINARY shares held as at the date of this confirmation statement DEREK WILSHER
Shareholding 367: Name:	0 ORDINARY shares held as at the date of this confirmation statement ROBERT KEITH WILSON
Shareholding 368: Name:	0 ORDINARY shares held as at the date of this confirmation statement DAVID JOHATHON WINGFIELD
Shareholding 369: Name:	0 ORDINARY shares held as at the date of this confirmation statement LEE JONATHON WINGFIELD
Shareholding 370: Name:	0 ORDINARY shares held as at the date of this confirmation statement KATHARINE WINSTANLEY MICHAEL WINSTANLEY
Shareholding 371: Name:	0 ORDINARY shares held as at the date of this confirmation statement CHRISTOPHER JOHN WISE

Shareholding 372: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **PETER WOOD**

Shareholding 373: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **JAMES WORKMAN**

Shareholding 374: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **BARNABY WYNTER**

Shareholding 375: **0 ORDINARY shares held as at the date of this confirmation statement**
Name: **SHANNON ZERMANI**

Shareholding 376: **77033 ORDINARY shares held as at the date of this confirmation statement**
Name: **FIREXO CORPORATION**

Confirmation Statement

I confirm that all information required to be delivered by the company to the registrar in relation to the confirmation period concerned either has been delivered or is being delivered at the same time as the confirmation statement

Authorisation

Authenticated

This form was authorised by one of the following:

Director, Secretary, Person Authorised, Charity Commission Receiver and Manager, CIC Manager, Judicial Factor



Companies House

CS01 (ef)

Confirmation Statement

Company Name: **FIREXO GROUP LIMITED**

Company Number: **11085973**

Received for filing in Electronic Format on the: **10/12/2023**



XCI3LEP4

Company Name: **FIREXO GROUP LIMITED**

Company Number: **11085973**

Confirmation **27/11/2023**

Statement date:

Confirmation Statement

I confirm that all information required to be delivered by the company to the registrar in relation to the confirmation period concerned either has been delivered or is being delivered at the same time as the confirmation statement

Authorisation

Authenticated

This form was authorised by one of the following:

Director, Secretary, Person Authorised, Charity Commission Receiver and Manager, CIC Manager, Judicial Factor

EXHIBIT D

CONFIRMATION STATEMENT FOR FIREXO MOTORSPORT LIMITED



Companies House

CS01 (ef)

Confirmation Statement

Company Name: **FIREXO MOTORSPORT LIMITED**
Company Number: **12841902**



Received for filing in Electronic Format on the: **11/10/2024**

XDDISOCY

Company Name: **FIREXO MOTORSPORT LIMITED**

Company Number: **12841902**

Confirmation **11/10/2024**

Statement date:

The company confirms that its intended future activities are lawful.

Full details of Shareholders

The details below relate to individuals/corporate bodies that were shareholders during the review period or that had ceased to be shareholders since the date of the previous confirmation statement.

Shareholder information for a non-traded company as at the confirmation statement date is shown below

Shareholding 1:	5 ORDINARY shares held as at the date of this confirmation statement
Name:	MICHAEL ANTONIOU
Shareholding 2:	5 ORDINARY shares held as at the date of this confirmation statement
Name:	RENATE ANTONIOU
Shareholding 3:	4 ORDINARY shares held as at the date of this confirmation statement
Name:	GARETH PAUL STANLEY BALDWIN
Shareholding 4:	7 ORDINARY shares held as at the date of this confirmation statement
Name:	STEPHEN BANFIELD
Shareholding 5:	10 ORDINARY shares held as at the date of this confirmation statement
Name:	TREVOR THOMAS BISWELL
Shareholding 6:	13 ORDINARY shares held as at the date of this confirmation statement
Name:	DAVID BREITH
Shareholding 7:	1 ORDINARY shares held as at the date of this confirmation statement
Name:	LAURA MARIE CAMPBELL
Shareholding 8:	2 ORDINARY shares held as at the date of this confirmation statement
Name:	SHAUN PATRICK CROSS
Shareholding 9:	10 ORDINARY shares held as at the date of this confirmation statement
Name:	RICHARD WILLIAM DEMPERS
Shareholding 10:	10 ORDINARY shares held as at the date of this confirmation statement
Name:	MICHAEL DEXTER
Shareholding 11:	3 ORDINARY shares held as at the date of this confirmation statement
Name:	TRACEY LOUISE EATON
Shareholding 12:	2 ORDINARY shares held as at the date of this confirmation statement
Name:	SUZANNE ESHELBY
Shareholding 13:	5 ORDINARY shares held as at the date of this confirmation statement
Name:	ENIS EVLAT
Shareholding 14:	8600 transferred on 2024-10-10
Name:	0 ORDINARY shares held as at the date of this confirmation statement
	FIREXO GROUP LIMITED

Shareholding 15:	20 ORDINARY shares held as at the date of this confirmation statement GARY FIXTER
Shareholding 16:	6 ORDINARY shares held as at the date of this confirmation statement STEPHEN LESLIE FRY
Shareholding 17:	4 ORDINARY shares held as at the date of this confirmation statement DAVID GEORGE GARDNER
Shareholding 18:	3 ORDINARY shares held as at the date of this confirmation statement UMAR SHERAZ GULZAR
Shareholding 19:	7 ORDINARY shares held as at the date of this confirmation statement GARY HEARN
Shareholding 20:	17 ORDINARY shares held as at the date of this confirmation statement LAMONT ANTHONY HECTOR
Shareholding 21:	2 ORDINARY shares held as at the date of this confirmation statement GRANT WILLIAM HENRY
Shareholding 22:	2 ORDINARY shares held as at the date of this confirmation statement HAYLEY HENRY
Shareholding 23:	3 ORDINARY shares held as at the date of this confirmation statement LILLY HENRY
Shareholding 24:	1 ORDINARY shares held as at the date of this confirmation statement MILLIE HENRY
Shareholding 25:	6 ORDINARY shares held as at the date of this confirmation statement TOM HOGAN
Shareholding 26:	4 ORDINARY shares held as at the date of this confirmation statement EDDIE HUTCHINSON
Shareholding 27:	10 ORDINARY shares held as at the date of this confirmation statement JAKPON LIMITED
Shareholding 28:	10 ORDINARY shares held as at the date of this confirmation statement CHRIS LETHEREN
Shareholding 29:	10 ORDINARY shares held as at the date of this confirmation statement PAUL LOCKING
Shareholding 30:	3 ORDINARY shares held as at the date of this confirmation statement TRACEY MAUNDER
Shareholding 31:	10 ORDINARY shares held as at the date of this confirmation statement

Shareholding 32: **30 ORDINARY shares held as at the date of this confirmation statement**
Name: **PAUL MENDOLIA**

Shareholding 33: **3 ORDINARY shares held as at the date of this confirmation statement**
Name: **ALAN MILEHAM**

Shareholding 34: **6 ORDINARY shares held as at the date of this confirmation statement**
Name: **TONI-ANN MILES**

Shareholding 35: **4 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROBERT PARISH**

Shareholding 36: **34 ORDINARY shares held as at the date of this confirmation statement**
Name: **ROGER GARY RAWLINSON**

Shareholding 37: **20 ORDINARY shares held as at the date of this confirmation statement**
Name: **PAUL REEVES**

Shareholding 38: **100 ORDINARY shares held as at the date of this confirmation statement**
Name: **MICHAEL RICCI**

Shareholding 39: **30 ORDINARY shares held as at the date of this confirmation statement**
Name: **DAVID NORMAN SHEAHAN**

Shareholding 40: **20 ORDINARY shares held as at the date of this confirmation statement**
Name: **PETER JAMES SHEAHAN**

Shareholding 41: **10 ORDINARY shares held as at the date of this confirmation statement**
Name: **BARRY BURNS SHEAHAN**

Shareholding 42: **2 ORDINARY shares held as at the date of this confirmation statement**
Name: **DIANA SIMMONDS**

Shareholding 43: **10 ORDINARY shares held as at the date of this confirmation statement**
Name: **ALAN JAMES MARTIN SUNDERLAND**

Shareholding 44: **7 ORDINARY shares held as at the date of this confirmation statement**
Name: **TRACY SYKES**

Shareholding 45: **10 ORDINARY shares held as at the date of this confirmation statement**
Name: **MICHAEL DAMIEN THORNTON**
ANDREA JEAN THORNTON

Shareholding 46: **2 ORDINARY shares held as at the date of this confirmation statement**
Name: **KAREN TURNER**

Shareholding 47: **10 ORDINARY shares held as at the date of this confirmation statement**
Name: **BRIAN ANDREW TURVEY**

Shareholding 48: **7 ORDINARY shares held as at the date of this confirmation statement**
Name: **LINDA WANSTALL**

Shareholding 49: **7 ORDINARY shares held as at the date of this confirmation statement**
Name: **LEE WANSTALL**

Shareholding 50: **3 ORDINARY shares held as at the date of this confirmation statement**
Name: **YVONNE WHEABLE**

Shareholding 51: **4 ORDINARY shares held as at the date of this confirmation statement**
Name: **JOHN WHEABLE**

Shareholding 52: **10 ORDINARY shares held as at the date of this confirmation statement**
Name: **ADRIAN JUSTIN WHITE**

Shareholding 53: **10 ORDINARY shares held as at the date of this confirmation statement**
Name: **FLEUR CAROLINE WHITE**

Shareholding 54: **20 ORDINARY shares held as at the date of this confirmation statement**
Name: **KATE WHITE**
ANDREW WHITE

Shareholding 55: **10 ORDINARY shares held as at the date of this confirmation statement**
Name: **LINDA WHY**

Shareholding 56: **4 ORDINARY shares held as at the date of this confirmation statement**
Name: **MARTYN WHYTE**

Shareholding 57: **33 ORDINARY shares held as at the date of this confirmation statement**
Name: **CHRISTOPHER JOHN WISE**

Shareholding 58: **8600 ORDINARY shares held as at the date of this confirmation statement**
Name: **FIREXO HOLDINGS LIMITED**

Confirmation Statement

I confirm that all information required to be delivered by the company to the registrar in relation to the confirmation period concerned either has been delivered or is being delivered at the same time as the confirmation statement

Authorisation

Authenticated

This form was authorised by one of the following:

Director, Secretary, Person Authorised, Charity Commission Receiver and Manager, CIC Manager, Judicial Factor

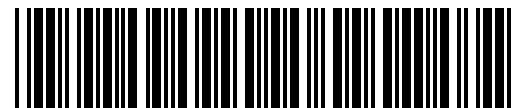
EXHIBIT E

CONFIRMATION STATEMENT FOR FIREXO LIMITED



Confirmation Statement

Company Name: **FIREXO LIMITED**
Company Number: **11984806**



Received for filing in Electronic Format on the: **11/10/2024**

XDDIS44R

Company Name: **FIREXO LIMITED**

Company Number: **11984806**

Confirmation **11/10/2024**

Statement date:

The company confirms that its intended future activities are lawful.

Full details of Shareholders

The details below relate to individuals/corporate bodies that were shareholders during the review period or that had ceased to be shareholders since the date of the previous confirmation statement.

Shareholder information for a non-traded company as at the confirmation statement date is shown below

Shareholding 1: **9500 transferred on 2024-10-10**
0 ORDINARY shares held as at the date of this confirmation statement
Name: **FIREXO GROUP LIMITED**

Shareholding 2: **500 ORDINARY shares held as at the date of this confirmation statement**
Name: **NICHOLA LOUISE STEWART**

Shareholding 3: **9500 ORDINARY shares held as at the date of this confirmation statement**
Name: **FIREXO HOLDINGS LIMITED**

Confirmation Statement

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Authorisation

Authenticated

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